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16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 ERICK CONTRERAS, as an individual
19 and on behalf of all others similarly
20 situated,

21 Plaintiff,
22 v.

23 WORLDWIDE FLIGHT SERVICES,
24 INC., a Delaware corporation; and DOES
1 through 100,

25 Defendants.

26 Case No.: 2:18-cv-06036-PSG-SS

27 Assigned to: Hon. Judge Philip S.
Gutierrez

28 **PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: October 7, 2019
Time: 1:30 p.m.
Courtroom: 6A

Action Filed: May 4, 2018
Pre-Trial Conf: April 6, 2020
Trial: April 21, 2020

1 NOTICE IS HEREBY GIVEN that on October 7, 2019, at 1:30 p.m. or as
2 soon thereafter as the matter may be heard in Courtroom 6A of the United States
3 District Court for the Central District of California, located at 350 West 1st Street,
4 Los Angeles, California 90012, before the Honorable Judge Philip S. Gutierrez,
5 Plaintiff Erick Contreras, as an individual and on behalf of all others similarly
6 situated, will and hereby does move this Court for entry of an Order pursuant to
7 Fed. R. Civ. Proc. 23(e) granting:

- 8 1. Preliminarily approval of the proposed Settlement of this lawsuit;
- 9 2. Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure,
10 provisional certification of the following Settlement Classes defined as:
 - 11 a. *Non-Bautista* Class Members: All current and former non-exempt employees who worked in California for Defendant Worldwide Flight Services, Inc. from December 1, 2016 through July 25, 2019 and who were not class members in *Guillermo Bautista v. Worldwide Flight Services, Inc.*, Los Angeles Superior Court Case No. BC622372; and
 - 16 b. *Bautista* Class Members: All current and former non-exempt employees who worked in California for Defendant Worldwide Flight Services, Inc. from April 2, 2017 through July 25, 2019 and who were class members in *Guillermo Bautista v. Worldwide Flight Services, Inc.*, Los Angeles Superior Court Case No. BC622372.
- 21 3. Preliminarily appointment of Plaintiff Erick Contreras as Class Representative;
- 23 4. Preliminary appointment of Scott M. Lidman, Elizabeth Nguyen, and
24 Milan Moore of Lidman Law, APC and Paul K. Haines of Haines Law Group, APC, as Class Counsel;
- 26 5. Scheduling a final fairness hearing to consider final approval of the
27 Settlement Agreement, entry of a proposed final judgment, Class

Counsel's Motion for Reasonable Attorneys' Fees and Costs, and the Class Representative Service Award;

6. Appointment of CPT Group, Inc., as the third-party settlement administrator for mailing notices and otherwise administering the settlement; and
7. Approval of the proposed Rule 23 Class Notice, and an order that it be disseminated to the proposed Settlement Classes provided in the Settlement Agreement.

This Motion is based on this Notice of Motion, the attached Memorandum of Points and Authorities, the declarations of Scott M. Lidman, Elizabeth Nguyen, Paul K. Haines, Milan Moore, Erick Contreras, and Julie Green of CPT Group, Inc. and the exhibits attached thereto, the pleadings and other papers filed in this action, and on any further oral or documentary evidence or argument presented at the time of hearing.

By: /s/ Elizabeth Nguyen
Elizabeth Nguyen
Attorney for Plaintiff
ERICK CONTRERAS